

Michelle R. Ghidotti-Gonsalves, Esq. (232837)
Ghidotti|Berger, LLP
1920 Old Tustin Ave.
Santa Ana, CA 92705
Tel: (949) 427-2010
Fax: (949) 427-2732
mghidotti@ghidottiberger.com

Authorized Agent for Creditor
US Bank Trust National Association as Trustee of the U.S. Bank Trust National Association as
Trustee of Chalet Series IV Trust C/O SN Servicing

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (CAMDEN)

In Re: RAYMOND W LEONG

Debtor(s).

) Case No.: 16-33299-ABA

) CHAPTER 13

) **REQUEST FOR SPECIAL NOTICE**

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTORS, AND ALL
INTERESTED PARTIES

PLEASE TAKE NOTICE that GHIDOTTI|BERGER, LLP, attorneys for U.S. Bank
Trust National Association as Trustee of Chalet Series IV Trust C/O SN Servicing hereby
requests special notice of all events relevant to the above referenced bankruptcy and copies of
all pleadings or documents filed in relation to the above referenced bankruptcy, including all
pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the
commencement of any adversary proceedings, the filing of any requests for hearing, objections,
and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which
must be noticed to creditors, creditors' committees and parties-in-interest and other notices as

1 required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-
2 referenced bankruptcy court.

3 GHIDOTTI|BERGER, LLP, requests that for all notice purposes and for inclusion in
4 the Master Mailing List in this case, the following address be used:

5 GHIDOTTI|BERGER, LLP
6 1920 Old Tustin Ave.
7 Santa Ana, CA 92705
Telephone (949) 427-2010 – Fax: (949) 427-2732
8 bknotifications@ghidottiberger.com

9 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
10 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
11 waiver of the within party's:

12 a. Right to have any and all final orders in any and all non-core matters entered
13 only after de novo review by a United States District Court Judge;

14 b. Right to trial by jury in any proceeding as to any and all matters so triable
15 herein, whether or not the same be designated legal or private rights, or in any case,
16 controversy or proceeding related hereto, notwithstanding the designation or not of such
17 matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial
18 right is pursuant to statute or the United States Constitution;

19 c. Right to have the reference of this matter withdrawn by the United States
20 District Court in any matter or proceeding subject to mandatory or discretionary withdrawal;
21 and

22 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
23 which this party is entitled under any agreements at law or in equity or under the United States
24 Constitution.

25 ///

26 ///

27 ///

28

1 All of the above rights are expressly reserved and preserved by this party without
2 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
3 or by any other participation in these matters.

4
5
6 Dated: July 8, 2019

GHIDOTTI|BERGER, LLP
By: /s/ Michelle R. Ghidotti-Gonsalves
Michelle R. Ghidotti-Gonsalves, Esq.
Authorized Agent for U.S. Bank Trust National
Association as Trustee of Chalet Series IV Trust
C/O SN Servicing

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (CAMDEN)

In Re; RAYMOND W LEONG

Case No.: 16-33299-ABA

CHAPTER 13

Debtor(s).

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen and not a party to the within action. My business address is: 1920 Old Tustin Avenue, Santa Ana, CA 92705.

I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

On July 8, 2019 I served the following documents described as:

• **REQUEST FOR SPECIAL NOTICE**

on the interested parties in this action by placing a true and correct copy thereof in a sealed envelope addressed as follows:

(Via United States Mail)

Debtor

Raymond W Leong
46 W Atlantic Ave
Audubon, NJ 08106

Debtor's Counsel

Seymour Wasserstrum
Law Offices of Seymour Wasserstrum
205 West Landis Avenue
Vineland, NJ 08360

Chapter 13 Trustee

Isabel C. Balboa
Chapter 13 Standing Trustee
Cherry Tree Corporate Center
535 Route 38 - Suite 580
Cherry Hill, NJ 08002

U.S. Trustee

U.S. Trustee
US Dept of Justice
Office of the US Trustee
One Newark Center Ste 2100
Newark, NJ 07102

xx (By First Class Mail) At my business address, I placed such envelope for deposit with the United States Postal Service by placing them for collection and mailing on that date following ordinary business practices.

 Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the Eastern District of California

xx (Federal) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 8, 2019 at Santa Ana, California

/s/ David Tragarz
David Tragarz